

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
THIRD DIVISION

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Duane A. Iverson and  
Sarah L. Iverson,

Court File No. 18-cv-1661

Plaintiffs,

vs.

**COMPLAINT**

Sakura Restaurant, Inc.,

Defendant.

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COME NOW the Plaintiffs, who for their cause of action against Defendant herein, state and allege:

1. At all times material and relevant herein, Plaintiffs have been residents and citizens of the State of Wisconsin;

2. Defendant has been a corporation with its principal place of business in the State of Minnesota;

3. The amount in controversy herein, exclusive of costs and disbursements, exceeds \$75,000. Jurisdiction is founded on the provisions of Title 28, U.S. Code, Sec. 1332;

4. On August 24<sup>th</sup>, 2013, Plaintiffs were conducting themselves in a lawful manner in their vehicle on a public highway in the City of Forest Lake, Minnesota, within the United States Judicial District of Minnesota, Third Division;

5. On said date and at said location, Defendant's motor vehicle was being operated with its permission and consent by Brittany A. Meyers, who so carelessly and negligently operated said automobile so as to cause a collision with the motor vehicle occupied by Plaintiffs, causing them grave and severe bodily injury;

6. The negligence of Brittany A. Meyers is chargeable to Defendant by operation of Minnesota Statutes;

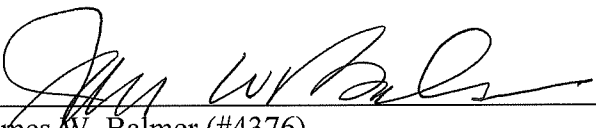
7. As a direct and proximate result of the carelessness and negligence of Defendant herein, Plaintiff Duane A. Iverson has incurred medical expense in the amount of at least \$20,000, suffered great pain, permanent disability, lost earning capacity and been prevented from transacting his affairs and lost wages in the sum of \$2,000;

8. As a further direct and proximate result of the carelessness and negligence of Defendant, Plaintiff Sarah L. Iverson has incurred healthcare costs in the amount of at least \$10,000, suffered great pain, permanent disability and will incur medical and healthcare expense in the future, all to her damage.

WHEREFORE, Plaintiffs pray judgment be entered in their favor and against Defendant for a reasonable sum of money in excess of \$75,000 and that they be awarded their costs, disbursements, and pre-judgment interest pursuant to Minn. Stat. §549.09 herein.

**FALSANI, BALMER, PETERSON & BALMER**

DATE: 05-03-18

  
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